

EXHIBIT A-1

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FRANKIE WILLIAMS, KIMBERLY ORD	:	
and MATTHEW DEVINE, on their own	:	
behalf and for all others similarly situated,	:	
Plaintiffs,	:	Civil Action No. 10-cv-07181
v.	:	
	:	Hon. Harvey Bartle, III
SECURITAS SECURITY SERVICES USA	:	
INC.,	:	
Defendant.	:	

DECLARATION OF RYAN F. STEPHAN, ESQ.

I, Ryan F. Stephan, an attorney in the above-captioned matter, hereby state under penalty of perjury that the following facts are true and correct to the best of my knowledge, information, and belief:

1. I am a principal of the law firm of Stephan Zouras, LLP ("SZ"). I submit this declaration in support of Plaintiffs' petition for an award of attorneys' fees earned and expenses incurred in connection with services rendered in the above-captioned litigation.

2. I have spent the majority of my professional time in the field of labor relations and, whenever necessary, litigation of those disputes.

3. I started SZ with my law partner James B. Zouras in 2007 and have practiced there for the past five years.

4. I submit this declaration to: i) apprise the Court of the total number of attorney hours SZ expended on this litigation; ii) apprise the Court of SZ's "out-of-pocket" litigation expenses in this matter; and, iii) provide the Court with justification for calculating my firm's lodestar.

5. My firm's resume is attached as Exhibit A.

6. Since SZ was first contacted about this matter its principals and professionals have conducted client intakes, investigated Plaintiffs' claims, drafted pleadings, responded to motions, conducted discovery, reviewed compensation and other records, taken depositions, attended settlement conferences, and worked with opposing counsel to successfully move for preliminary approval of class settlement, amongst other things.

7. The hourly rates for SZ principals (\$450-\$500/hour) and professional support staff (\$125/hour) have been accepted and approved in other contingent litigation and are comparable to rates charged by Plaintiff's counsel in similar cases. SZ actively prosecutes dozens of individual, class and collective actions and working on this litigation has prevented SZ from prosecuting other cases

8. According to contemporaneous time records, SZ has invested 117.75 hours on this litigation. SZ's lodestar is \$57,912.50. SZ's contemporaneous time records supporting this total are available for the Court's inspection upon request.

9. SZ incurred \$2,974.63 in outstanding expenses in connection with the prosecution of this litigation.

10. The expenses incurred in this action are reflected on SZ's books and records. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate recordation of the expenses incurred. The expenses incurred are expenses normally charged to clients and were reasonable and necessary to prosecute the case. They are normal costs charged to clients and not part of SZ's overhead.

11. I have not received any money from Plaintiff for my legal fees or costs.

I, Ryan F. Stephan, hereby declare, subject to penalty of perjury, that the above facts are true and correct to the best of my knowledge, information, and belief.

Date: October 17, 2012

FURTHER DECLARANT SAYETH NOT.



Ryan F. Stephan